Pinnacle Foods Group, LLC.
Vlasic Plant
Millsboro, DE

Storm Water Pollution Prevention Plan

SWP3 **November 2011**

ORIGINAL PREPARED BY:

CABE Associates, Inc.
CONSULTING ENGINEERS
144 S. GOVERNORS AVE.
PO BOX 877
DOVER, DE 19903-0877
302-674-9280

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JULY 2003

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VLASIC FOODS, INC.

MILLSBORO, DELAWARE

STORM WATER PLAN

FOR POLLUTION PREVENTION

OCTOBER 1999

CABE ASSOCIATES, INC.
CONSULTING ENGINEERS

144 S. GOVERNORS AVENUE
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DOVER, DELAWARE 19903-0877
302-674-9280

PROJECT NO. 153-036

TABLE OF CONTENTS

LIST OF EXHIBITS

FACILITY MANAGEMENT CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I also certify that the Best Management Practices identified herein will be implemented, there are no floor drain connections the stormwater drainage system and any illicit connections to the stormwater system will be corrected according to the timetable identified in the implementation schedule. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for will full violations.

Randy Spence
Name

Plant Manager - Millsboro
Title

R. Spence
Signature

11/07/11
Date

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Randy Spence
Name

Plant Manager - Millsboro
Title

R. Spence
Signature

6/30/08
Date

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John C. Moore
Name

Director of Operations - Vlasic
Title

John C Moore
Signature

3/7/06
Date

Plan Review Log

By	Date	Date of Plan	Revision Activity	Necessary?	If Revision is necessary, must complete within 6 months of review
Robert Lynch	11/10/11	July 2003	Review	Yes	

Plan Review Log

By	Date	Date of Plan	Activity	Revision Necessary?	If Revision is necessary, must complete within 6 months of review
Beth Sise	12/13/07	July 2003	Review	No	

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STEVEN D. McNULTY
Name

DIRECTOR OF PLANT OPERATIONS
Title

Signature

5/17/00
Date

PROFESSIONAL ENGINEER'S CERTIFICATION

I certify that I have reviewed this document and that, based on my knowledge of the facility, the comments, findings, recommendations and planned Best Management Practices are in accordance with good engineering practices.

Lee J. Beetschon
Name

Signature

10-8-99
Date
(SEAL)

List of Revisions

While the original storm water plan required a State of Delaware Engineering Seal, the DE regulations no longer require this. Upon reviewing the plan, only a few minor changes have been made. Compounds such as ammonia, caustic, and no-lead gasoline have been removed from the plan, since they have been removed for the property. Several check sheets have also been updated. The listing of Significant Spills has been developed as a log in Attachment D rather than a narrative in the plan to facilitate updates. The more recent Delaware regulations have been inserted as well as the current NPDES permit for Pinnacle Foods Group, LLC. The following pages have been slightly modified to reflect these changes:

I-2	Water Priority Chemicals Requirement
II-6	Significant Materials Inventory – Drainage Area 2
II-7	Significant Materials Inventory – Drainage Area
II-9	Significant Material List – caustic, gas and waste oil removed
Exhibit III-1	Visual Inspection Log
Exhibit III-2	Visual Inspection Schedule
Exhibit IV-1	Implementation Schedule – completed
Exhibit IV-2	Verbal Release Report
Exhibit IV-3	Written Release Report
Exhibit IV-5	Annual Compliance Checklist
Exhibit IV-6	Annual Compliance Certification
Attachment D	Significant Spill Log

On every page throughout this document, where the company name is Vlasic Foods Inc., please note the name has been changed to Pinnacle Foods Group, LLC.

Revision 11/2011

REVISION CHECKSHEET

The owner or operator must complete a review and evaluation of the Storm Water Plan for Pollution Prevention at least once every three years. As a result of this review and evaluation, the owner or operator shall amend this SWP3 Plan within six months of the review to include any structural changes to the facility that could potentially impact storm water. Evidence of these reviews shall be recorded herein.

Signature	Date
Robert Lynch	11/10/11

BACKGROUND

CHAPTER I

I. BACKGROUND

A. Purpose

The discharge of stormwater from the Pinnacle Foods Corporation facility, referred to hereafter as the Facility, located in Millsboro, Delaware is subject to the conditions of the National Pollutant Discharge Elimination System (NPDES) Permit No. DE 0000736, referred hereafter as the NPDES permit. A copy of the NPDES permit is included as Attachment A. Part III.A Special Conditions, Condition 7, of the NPDES permit requires the facility to develop, implement, and maintain a stormwater plan (SWP) to minimize the discharge of contaminated stormwater from the facility. The SWP is to be developed, implemented and maintained in accordance with the requirements of the Delaware Regulations Governing the Control of Water Pollution (RGCWP), Section 9, "The General Permit Program", Subsection 1, "Regulations Governing Stormwater Discharges Associated with Industrial Activity", Part 1, "Baseline General Permit" and Part 13, "Special Conditions for Stormwater Discharges Associated with Food Processing Activities." This document has been prepared in accordance with the RGCWP using a format provided in the EPA reference Stormwater Management for Industrial Activities: Developing Pollution Prevention Plans and Best Management Practices.

B. Site Description

The Facility is located on Route 331, southeast of Millsboro, Delaware as shown on Exhibit I-1. The industrial activity at the facility is the production of pickles, relish and pepper products. Fresh produce and salt stock arrives by truck and is received in the grading area. Sugar, vinegar and salt are also delivered by tractor-trailer to the facility for processing purposes. The produce is packed in the production area and pasteurized, labeled and packaged for storage in the warehouse. Produce that is not processed upon arrival is stored in the tank yard, consisting of over 400 wooden tanks.

The facility is divided into ten (10) drainage areas. The majority of storm water from the site is discharged to Wharton's Branch, a tributary of the Indian River. Some storm water infiltrates on site. Exhibit I-2 shows each drainage area and the respective drainage patterns in each area.

C. Water Priority Chemicals Requirements

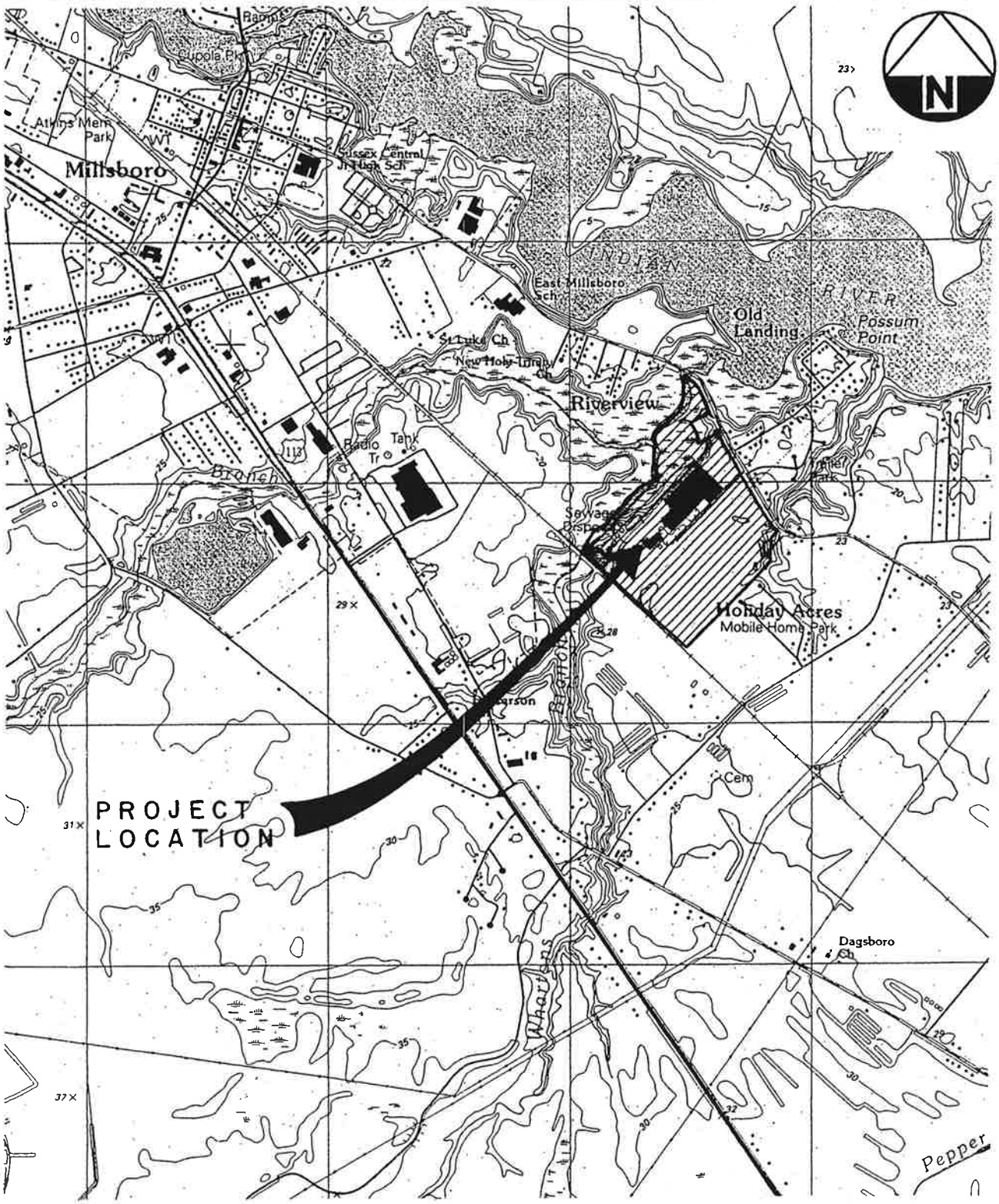
There are special provisions in the general NPDES permit regulations for certain chemicals identified in Section 313 of the Emergency Planning and Community Right-to-Know Act (EPCRA). Section 313 requires operators of facilities that handle toxic chemicals in amounts exceeding threshold levels to report to EPA and a designated state agency on an annual toxic release inventory (TRI) report. "Not all facilities subject to EPCRA Section 313 are subject to these NPDES requirements. A facility that submits Form R is subject to storm water permitting requirements only if industrial materials or activities are exposed to stormwater, and if the facility is reporting to TRI for one of the "section 313 water priority chemicals" as defined under the NPDES requirements." *(EPA Economic Analysis of the Final Rule to Modify Reporting of Persistent Bioaccumulative Toxic Chemicals Under EPCRA Section 313, 10/1999).* The Department of Natural Resources and Environmental Control (DNREC) has also concluded that facilities that handle toxic chemicals have an increased potential to degrade the water quality of receiving streams. Therefore, DNREC has established specific control requirements in RGCWP at Sections 9.1.01.4A.5.b. and 9.1.01.5.k. that apply to facilities that handle Section 313 water priority chemicals. The requirements include monitoring and provisions for containment, drainage control and /or diversionary structures. Water priority chemicals include any of over 200 chemicals that have been specifically identified by EPA as especially toxic to water ecosystems. The complete list of Section 313 water priority chemicals is included as Attachment B. This list is subject to change but can be considered complete and accurate as of the effective date of the SWP.

This facility has reported two (2) Section 313 chemicals on the Form R during the reporting years 2000 - 2002: Polycyclic Aromatic Compounds (PAC) and

Benzo(g,h,i)perylene. These chemicals are components of the Number 6 fuel oil combusted at the facility and would be contained in the 20,000-gallon fuel oil tank located within a building and containment structure – it is not exposed to stormwater. The 5 individual chemicals calculated for under PAC and the benzo are not on the current Section 313 water priority chemicals list. "These special requirements are based on the coverage of EPCRA Section 313 at the time the permits are issued. These requirements do not apply to facilities that must report to TRI because chemicals are subsequently added to the EPCRA Section 313 list of toxic chemicals, or because EPCRA Section 313 reporting requirements are subsequently expanded to facilities outside SIC 20-39" *(EPA Economic Analysis of the Final Rule to Modify Reporting of Persistent Bioaccumulative Toxic Chemicals Under EPCRA Section 313, 10/1999).*

This facility does not handle any of the Section 313 water priority chemicals in quantities that exceed the reporting thresholds; therefore, this section does not apply.

EXHIBITS



SCALE : 1" = 2000'

cabe 153-036 OCTOBER 1998 153A	LOCATION MAP	EXHIBIT 1 – 1

SITE ASSESSMENT

CHAPTER II

II. SITE ASSESSMENT

A. Drainage Areas and Outfalls

The facility is divided into ten (10) stormwater drainage areas. Outfalls 001-005, 007 and 009 are identical to the NPDES permitted outfalls. Outfalls 006 and 008 from the NPDES permit have been physically changed since the original issuance of the permit and are no longer point source discharges from the facility. These outfalls currently discharge as sheet flow through Drainage Area 8. Drainage Area 6 was assigned to an area of the facility that has no outfall, enabling the balance of the SWP outfalls to remain consistent with the NPDES permit. Drainage Area 10 either infiltrates into the packed dirt areas or discharges as sheet flow. Each of the drainage areas and respective drainage patterns is shown on Exhibit I-2. The drainage areas have been delineated based on visual observation and facility drawings and are described as follows:

1. Drainage Area 1

   Drainage area 1 collects both process wastewater and stormwater. This area includes part of the sorting area and part of the storage yard. A dumpster pad is located here with a segregated trench drain to wastewater treatment. Flow from this drainage area is conveyed to on-site wastewater treatment facilities. Following treatment, the flow from drainage area 1 is discharged to Whartons Branch through a 12" culvert designated outfall 001. The outfall is the only outfall permitted to discharge treated wastewater. A pad mounted electrical transformer is located within this drainage area.

   Industrial activities in drainage area 1 include product sorting and storage and waste storage.

2. Drainage Area 2

   Drainage area 2 collects stormwater from part of the wastewater treatment facilities and a portion of the railroad tracks serving the facility. Stormwater from this drainage area

flows to a swale that discharges into Whartons Branch as outfall 002. A pole mounted electrical transformer is located within this drainage area.

Industrial activities in drainage area 2 include wastewater treatment and transportation by rail.

3. Drainage Area 3

   Drainage area 3 is a relatively small area that includes a portion of the railroad tracks and plant yard to the east of the aeration pond. Stormwater from this area flows to a swale to thc east of the aeration pond and discharges into Whartons Branch through outfall 003.

   Industrial activities in drainage area 3 include wastewater treatment and transportation by rail.

4. Drainage Area 4

   Drainage area 4 is a relatively large area that produces both non-sanitary wastewater and stormwater. Process wastewater from the following areas is piped directly to the wastewater treatment facilities via the main wastewater lift station (Wimco Pit):

   - Loading Dock
   - Dumpster Pad
   - Sorting Area

   Both process wastewater and stormwater from the brine storage tank drainage area are conveyed to a lift station (diversion). The precast concrete lift station consists of a 15" concrete influent pipe, a screen with bars spaced on ½" centers, an overflow outlet and a self-priming centrifugal 200 GPM solids-handling pump. During rain events, the lift station pumps all or a portion of stormwater runoff form this drainage area to the wastewater treatment facilities. However, the excess overflows to outfall 004. The

stormwater runoff from the remaining portion of drainage area 4, other than the loading dock, dumpster pad, sorting area and brine storage tank area drains through storm drain 004.

The following buildings and areas are located in this drainage area:

- Production
- Employee Parking Lots
- Vinegar Storage
- Grading Office
- Salt Shed
- Part of the Sorting Area Roof
- Water Treatment Plant
- Maintenance Shop
- Compressor Building
- Product Storage
- 3 Pad Mounted Electrical Transformers
- 2 Pole Mounted Electrical Transformer Racks
- Emergency Generator
- No. 6 Fuel Oil Building

Industrial activities in this drainage area include product loading/unloading, sorting, and storage.

5. Drainage Area 5

Drainage area 5 includes parts of the production building and warehouse roofs. In this drainage area, stormwater is collected by roof drains and catch basins and conveyed through an 18" diameter culvert that discharges into Whartons Branch through outfall 005.

Industrial activities in this drainage area include production, maintenance, and storage.

6. Drainage Area 6

   Drainage area 6 is a large field used for spray irrigation of wastewater – non-contact cooling water from the Pasteurizers. Stormwater from this area infiltrates into the ground and has no outfall. This area is involved in the nutrient offset plan of the NPDES permit.

   The only industrial activity in this drainage area is the spray irrigation of wastewater.

7. Drainage Area 7

   Drainage area 7 includes half the roof of the new warehouse, new loading dock, entrance roadway, and outlying grassed areas. Stormwater from this drainage area is collected by roof drains, a trench drain, and catch basins and is conveyed underneath the building through a 15" diameter pipe that discharges into Whartons Branch as outfall 007.

   Industrial activities in this drainage area include product storage, loading, and vehicular transportation to and from the site.

8. Drainage Area 8

   Drainage area 8 includes several areas that discharge to Whartons Branch as sheet flow. Areas in drainage 8 are:

   - Warehouse Roof
   - Trailer Parking
   - Part of the Railroad Tracks
   - Part of the Wastewater Treatment Facilities
   - Wooded Area on North Side of Property
   - Pad Mounted Electrical Transformer

Industrial activities in this drainage area include transportation by rail, wastewater treatment, product loading/unloading, and product storage.

9. Drainage Area 9

   Drainage area 9 includes the warehouse roof and original loading dock. Stormwater from this drainage area is collected by roof drains and carried to a 15" storm sewer. This pipe discharges to Whartons Branch through outfall 009.

   The only industrial activity in this drainage area is product storage in the warehouse.

10. Drainage Area 10

    Drainage area 10 includes the most westerly section of the plant that is hard packed dirt and shell. This area sees truck traffic and may have parked trailers during the green season. A portion of the railroad track passes through this area and clean salvaged equipment is located in the northern section. Stormwater either infiltrates or passes off through sheet flow.

    Industrial activities in this drainage area include transportation by rail, truck traffic, and equipment storage.

B. Significant Materials Inventory

By definition, the term "significant material" includes, but is not limited to, fuels, raw materials used in food processing or production such as peppers and cucumbers, materials such as solvents, detergents, finished materials such as pickles or relish, hazardous substances designated under Section 101(14) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), and any chemical the facility is required to report pursuant to Section 313 of Title III of the Superfund Amendments and Reauthorization Act (SARA), fertilizers, pesticides and waste products such as ashes, slag, and sludge that have a potential to be released with stormwater discharges. The definition also includes sites used for application or disposal of process wastewater. If significant materials are exposed to stormwater runoff, the potential exists for them to be carried to a receiving stream with the stormwater flow. Therefore, identification of these materials helps to determine where potential contamination exists and helps identify the need for appropriate controls to address storm water pollution prevention. Per DNREC regulations: 9.1.01.0(22) Significant Materials: means substances, products, or wastes that are exposed to precipitation and can contribute pollutants to stormwater runoff or stormwater infiltration. Materials, which cannot contribute pollutants to stormwater runoff, are not considered significant materials.

As a food processor, it is inherently important to keep the area clear of pests and insects. The facility maintains a contract with a reputable licensed pest control company to apply pesticides, insecticides and rodenticides in accordance with all laws and regulations. No chemicals are stored on site. The contract company maintains inventories off-site and only applies products that are approved for use in food manufacturing settings at the recommended rates.

An inspection of the facility's grounds and building roofs was performed during normal working hours on April 25, 2003 to identify significant materials exposed to storm water. Significant material storage and handling areas exposed to storm water are described as follows:

1. Drainage Area 1

   No significant materials were identified during the inspection: however there is the potential for tractor-trailers to drip product.

2. Drainage Area 2

   This drainage area contains 55-gallon drums of anti-foam and polymer. These raw materials are a potential source of significant materials that could contaminate stormwater runoff if spilled.

3. Drainage Area 3

   During the inspection, there were no significant materials identified in this drainage area. This drainage area does contain a portion of a railroad serving the facility. Train traffic could potentially produce accidental spillage of significant materials that could contaminate the storm water runoff.

4. Drainage Area 4

   In this drainage area, truck traffic and the unloading and sorting of cucumbers produce product drippings and residues. These residues would likely contaminate storm water runoff during a storm event.

   Vinegar and ethanol storage tanks are located in this drainage area. These tanks are provided with secondary containment. These tanks receive shipments on a routine basis. Residues of these materials are a potential source of significant materials.

   A sugar tank located in this area periodically receives shipments of liquid sugar. Following the receipt of sugar, residues remain on the ground near the tank and are a source of significant materials.

   Liquid brine solution (salt) storage tanks constitute another significant material in this drainage area and could contaminate storm water.

The potable water treatment plant is located within a building in the drainage area. Truck traffic transporting treatment chemicals into the facility and building could create a source of stormwater contamination. Chemicals located within the building are sodium hypochlorite, sodium hydroxide and potassium permanganate.

An emergency power diesel generator is located within this drainage area. The fuel supply tank is provided with secondary containment. The generator receives fuel shipments by a small fuel truck on an infrequent basis and could contribute to stormwater runoff.

A No. 6 fuel oil tank is located within an enclosed building with secondary containment in this drainage area. The fuel oil contains SARA Section 313 reportable chemicals that are not currently on the Water Priority Chemical listing. The tank is not exposed to stormwater; however, routine tractor-trailer deliveries could create residues that could contaminate stormwater. The Facility's Spill Prevention, Control and Countermeasures Plan addresses in more detail the handling of spills from this operation as well as the above described diesel generator and the diesel fire pump discussed in Drainage Area 8.

Potential non-storm water discharges are located in this drainage area. These discharges are discussed further in Chapter II.D.

5. Drainage Area 5

   A potential significant material located in this area is propylene glycol used in a refrigeration system for the Pasteurizers cooling water chiller. The glycol could be accidentally spilled during servicing of the equipment. This drainage area also contains a portion of a railroad serving the facility. Train traffic could potentially produce accidental spillage of significant materials that could contaminate the storm water runoff.

6. Drainage Area 6

   Spray irrigated wastewater is likely the only potential significant material in this drainage area. The facility maintains a DNREC spray irrigation permit for this operation.

7. Drainage Area 7

   In this drainage area, no significant materials were identified during the inspection. There is the potential for drippings from vehicular traffic to contaminate stormwater runoff.

8. Drainage Area 8

   An emergency firewater pump and diesel tank is located within a building in drainage area 8. The diesel pump receives fuel shipments by a small fuel truck on an infrequent basis and could contribute to stormwater runoff. There is the potential for tractor-trailers to drip product during loading and unloading and for spillage from the railroad traffic through the drainage area.

9. Drainage Area 9

   No significant materials were identified in this drainage area during the inspection. This drainage area does contain a portion of a railroad serving the facility. Train traffic could potentially produce accidental spillage of significant materials that could contaminate the stormwater runoff.

10. Drainage Area 10

    No significant materials were identified in this drainage area during the inspection. This drainage area does contain a portion of a railroad serving the facility. Train traffic could potentially produce accidental spillage of significant materials that could contaminate the stormwater runoff.

Section 9.1.01.5.E.2.b. of the RGCWP requires that the SWP include an estimate of the yearly quantities of Significant Materials handled by the facility. An approximation of the annual quantities of significant materials handled at the plant is presented as follows:

Significant Material	Estimated Annual Quantity	
Produce	83,922,900	pounds
Salt	5,353,220	pounds
Sugar	8,352,000	pounds
Vinegar	892,000	gallons
~~Ethanol~~	~~70,000~~	~~gallons~~
No. 6 Fuel Oil	400,000	gallons
Diesel Fuel	600	gallons

In accordance with 9.1.01.2.H. Additional Requirements for Salt Storage, the Facility does not maintain storage piles of dry salt. Rock salt is purchased and directly off loaded into a lixator system – tankage of salt water. The brine (salt water) is distributed throughout the facility as a liquid. Most of the brine tanks and produce storage/processing tanks are uncovered yet they do provide enclosure of the salt solution and exposure to precipitation is irrelevant.

C. Significant Spills and Leaks

EPA has defined significant spills to include releases of hazardous substances, within a 24-hour period, in excess of reportable quantities. Reportable quantities are specific amounts of substances in pounds, gallons, or other units that are listed in 40 CFR Part 117, 40 CFR Part 302, and state regulations. DNREC revised its "Reporting of A Discharge of a Pollutant or an Air Contaminant" regulations in November 2002 with minor modifications to the listing in May 2003. The latest set of regulations is contained within Attachment C. DNREC Environmental Releases are defined to include any spillage, leakage, emission, discharge, or delivery into the air or waters on or into the lands of this State, of any sewage of 10,000 gallons or more, oil, industrial waste, liquid waste, hydrocarbon chemical, hazardous substance, hazardous waste, restricted chemical material, vessel discharge, air contaminant, pollutant, regulated biological substance or other wastes reportable pursuant to the Comprehensive Environmental Response, Compensation and Liability Act of 1980 as amended or this Regulation.

The RGCWP requires a listing of substantial spills, leaks or residual deposits of Significant Materials that have occurred within the last three years in areas that are exposed to precipitation or that otherwise drain to a stormwater conveyance at the facility. This section of the plan must be updated annually. Information to be documented should a spill or leak occur includes date, material, quantity spilled, cause of spill or leak, response actions and actions taken to prevent similar such spills or leaks in the future. This effort will aid the facility operator as they examine existing spill prevention and response procedures for revisions.

This Spill Log shall be maintained as Attachment D of the Plan to facilitate ease of information entry.

D. Non-Stormwater Discharges

Discharges to the stormwater system of anything other than stormwater shall be eliminated or be in compliance with an appropriate NPDES permit. The NPDES permit for this facility contains provisions for the discharge of stormwater and has no exclusions for non-stormwater discharges. Thus, the non-stormwater discharges in this section are permitted by the NPDES permit.

At this facility, the potential for two (2) non-storm water discharges were identified. The first is the condensate of cooling systems for the facility. At times, air conditioners may drip condensate water on the production building roof. This is an industrial non-storm water discharge according to Mr. Charles Shadel of DNREC as discussed on October 21, 1998 at 4:40 PM. For the purpose of preparing a SWP, Mr. Shadel recommended acknowledging that the condensate is a non-storm water discharge, but allowing for it to continue with out changing current practices.

The second potential non-stormwater discharge is around the product receiving pad and trailer parking area. These areas are graded such that the first flush of product drippings and wash water is directed to the wastewater treatment facilities. However, during heavy rains all significant materials may not be captured in the first flush and thus may be discharged through outfall 004.

E. Monitoring Requirements

The Environmental Control Manager is responsible for stormwater monitoring. The previous NPDES permit required that outfalls 002, 004 and 009 be monitored quarterly for a two year time period. The NPDES permit issued on December 1, 2000, provided as Attachment A, reduced the required monitoring to only outfall 004. It requires sampling and testing of one storm event every other year during the life of the permit. Outfalls 002, 003, 005, 006, 007, 008 and 009 are authorized to discharge only stormwater free from floating solids, sludge deposits, debris, oil and scum.

Outfall 004 is monitored for Flow, Chlorides, BOD5, TSS, Enterococcus, Ammonia (as N), and pH. The frequency, methods of sampling and reporting requirements are set forth in the permit.